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19 UNITED STATES OF AMERICA

20 UNITED STATES DISTRICT COURT
21
22 FOR THE CENTRAL DISTRICT OF CALIFORNIA
23
24 SOUTHERN DIVISION

25 UNITED STATES OF AMERICA,
26
27 Plaintiff,
28
v.
\$76,281.21 SEIZED FROM ONE
PACIFIC PREMIER BANK
ACCOUNT,
Defendant.

No. 8:23-cv-02280

VERIFIED COMPLAINT FOR
FORFEITURE

18 U.S.C. §§ 981(a)(1)(A) and (C) and 984
[F.B.I.]

1 Plaintiff United States of America (“the government”) brings this claim against
2 the defendant \$76,281.21 Seized from One Pacific Premier Bank Account, and alleges as
3 follows:

4 **JURISDICTION AND VENUE**

5 1. The government brings this *in rem* forfeiture action pursuant to 18 U.S.C.
6 §§ 981(a)(1)(A) and (C) and 984.

7 2. This Court has jurisdiction over the matter under 28 U.S.C. §§ 1345 and
8 1355.

9 3. Venue lies in this district pursuant to 28 U.S.C. § 1395.

10 **PERSONS AND ENTITIES**

11 4. The plaintiff in this action is the United States of America.

12 5. The defendant is \$76,281.21 Seized from One Pacific Premier Bank
13 Account (the “defendant funds”), which were seized pursuant to a federal seizure
14 warrant at Pacific Premier Bank, 1035 State Street, Santa Barbara, California 93101, on
15 November 14, 2022, from a bank account ending in 7646 in the name of Richard
16 Lettelier and for which he is the sole signatory (“Pacific Premier x7646”).

17 6. The defendant funds are in the custody of the United States Marshals
18 Service in this District, where they will remain subject to this Court’s jurisdiction during
19 the pendency of this action.

20 7. The interests of Richard Lettelier (“Lettelier”) and GTX Turf Farms, L.P.
21 (“GTX”) may be adversely affected by these proceedings.

22 **BASIS FOR FORFEITURE**

23 **Fraud Scheme Proceeds Are Transferred To Pacific Premier x7646**

24 8. On August 10, 2021, a representative of GTX contacted the Santa Barbara
25 Police Department (“SBPD”) and reported that GTX was the recent victim of an email
26 hacking scheme whereby an unknown person gained unauthorized access to a GTX
27 email account. The hacker then used that unauthorized access to send false instructions
28 to GTX’s accountant instructing him to issue a company check in the amount of

1 \$84,500.50 made payable to Lettelier, and to send the check to Lettelier's home in
2 Rancho Santa Margarita, California.¹

3 9. On August 2, 2021, GTX sent via federal express to Lettelier check #5445
4 drawn on GTX's Bank of America checking account, payable to Lettelier for
5 \$84,500.50.

6 10. On August 3, 2021, Lettelier received the check, traveled to a Mission
7 Viejo, California Comerica bank branch and deposited the check into his Comerica Bank
8 account ending in 9209 ("Comerica x9209").

9 11. On September 7, 2021, Comerica Bank closed Comerica x9209, and
10 provided Lettelier with a cashier's check payable to him for the remaining funds in the
11 account totaling \$78,364.21, which cashier's check Lettelier took to a Laguna Niguel,
12 California bank branch and deposited that same day into Pacific Premier x7646 (*i.e.*, the
13 account from which the defendant funds were seized).

14 12. In September 2021, a SBPD Detective interviewed Lettelier, who told the
15 SBPD Detective the following:

- 16 a. Lettelier is married to a person named Sophia Martins, who has a
17 business partner allegedly named Linda Gomez.
- 18 b. Lettelier communicates with Gomez by text and phone only, and has
19 never met her in person, and Gomez and Martins have spent the past
20 few years together living in South Africa, while on a business trip.
- 21 c. Gomez and Martins have told Lettelier that they needed money to
22 return to the United States.
- 23 d. Lettelier has previously sent money to Gomez and Martins for food,
24 hotel, and hospital expenses.
- 25 e. Lettelier met Martins in 2014 in California and they eventually
26

27 ¹ Pursuant to Local Rule 5.2-1, only the city and state of personal residences are
28 set forth in this Complaint.

1 married. Martins lived with Lettelier at his residence in California
2 until 2017, when Martins left for South Africa where she has
3 remained ever since.

4 f. Lettelier receives mailed checks that he deposits, as well as wire
5 transfers that are deposited into his bank account(s). Lettelier
6 receives these funds from other individuals, in some cases
7 approximately every two weeks. Lettelier sends the received funds to
8 Gomez and Martins.

9 **Lettelier Received Additional Fraud Proceeds From Another Victim**

10 13. A Special Agent with the Federal Bureau of Investigation and SBPD
11 Detective interviewed a fraud victim “N.K.” whose funds Lettelier had deposited into his
12 Comerica x9209 account in 2021.

13 14. In December 2021, N.K. told the SBPD Detective that N.K. had met an
14 individual on an on-line dating service, and had only ever communicated with the
15 individual on-line or by telephone. That individual, a romance fraudster, claimed to be a
16 civil engineer from Miami, Florida, and told N.K. that the individual had moved to
17 Africa. The individual asked N.K. for small amounts of money at first, then larger
18 amounts. Following the individual romance fraudster’s instructions, N.K. wrote checks
19 payable to Lettelier and mailed them to Lettelier’s residential address.

20 15. Lettelier deposited at least \$19,000.00 in N.K.’s stolen romance fraud funds
21 into Lettelier’s Comerica x9209 account in 2021. Those romance fraud funds were
22 withdrawn from Comerica x9209 before Lettelier’s deposited the stolen GTX funds into
23 the same account.

24 **FIRST CLAIM FOR RELIEF**

25 16. Based on the above, plaintiff United States of America alleges that the
26 defendant funds constitute or are derived from proceeds traceable to, or a conspiracy to
27 commit violations of 18 U.S.C. § 1343 (wire fraud), which is a specified unlawful
28 activity as defined in 18 U.S.C. §§ 1956(c)(7)(A) and 1961(1)(B). The defendant funds

1 are therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C). In addition, to
2 the extent that the defendant funds are not the actual monies directly traceable to the
3 illegal activity identified herein, plaintiff United States of America alleges that the
4 defendant funds are identical property found in the same account or place as the property
5 involved in the specified offense, rendering the defendant funds subject to forfeiture
6 pursuant to 18 U.S.C. § 984.

7 **SECOND CLAIM FOR RELIEF**

8 17. Based on the above, plaintiff alleges that the defendant funds constitute
9 property involved in multiple transactions or attempted transactions in violation of 18
10 U.S.C. § 1956(a)(1)(B)(i), or property traceable to such property, with the specified
11 unlawful activity being a violation of 18 U.S.C. § 1343 (wire fraud). The defendant
12 funds are therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A). In
13 addition, to the extent that the defendant funds are not the actual monies directly
14 traceable to the illegal activity identified herein, plaintiff United States of America
15 alleges that the defendant funds are identical property found in the same account or place
16 as the property involved in the specified offense, rendering the defendant funds subject
17 to forfeiture pursuant to 18 U.S.C. § 984.

18 **THIRD CLAIM FOR RELIEF**

19 18. Based on the above, plaintiff alleges that the defendant funds constitute
20 property involved in multiple transactions or attempted transactions in violation of 18
21 U.S.C. § 1957(a), or property traceable to such property, with the specified unlawful
22 activity being a violation of 18 U.S.C. § 1343 (wire fraud). The defendant funds are
23 therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A). In addition, to the
24 extent that the defendant funds are not the actual monies directly traceable to the illegal
25 activity identified herein, plaintiff United States of America alleges that the defendant
26 funds are identical property found in the same account or place as the property involved
27 in the specified offense, rendering the defendant funds subject to forfeiture pursuant to
28 18 U.S.C. § 984.

1 WHEREFORE, plaintiff United States of America prays:

2 (a) that due process issue to enforce the forfeiture of the defendant funds;

3 (b) that due notice be given to all interested parties to appear and show cause
4 why forfeiture should not be decreed;

5 (c) that this Court decree forfeiture of the defendant funds to the United States
6 of America for disposition according to law; and

7 (d) for such other and further relief as this Court may deem just and proper,
8 together with the costs and disbursements of this action.

9 Dated: December 4, 2023

E. MARTIN ESTRADA

United States Attorney

10 MACK E. JENKINS

11 Assistant United States Attorney

12 Chief, Criminal Division

JONATHAN GALATZAN

13 Assistant United States Attorney

14 Chief, Asset Forfeiture and Recovery Section

15 /s/ James E. Dochterman

16 JAMES E. DOCHTERMAN

17 Assistant United States Attorney

18 Attorneys for Plaintiff

19 United States of America
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VERIFICATION

I, Taylor Greig, hereby declare that:

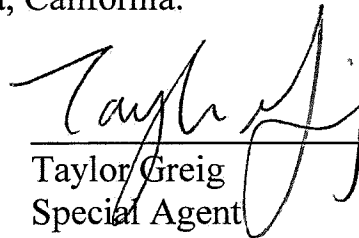
1. I am a Special Agent of the Federal Bureau of Investigation and am familiar with this investigation.

2. I have read the above Verified Complaint for Forfeiture and know its contents. It is based upon my own personal knowledge and reports provided to me by other law enforcement agents, which I believe to be reliable.

3. Everything contained in the Complaint is true and correct, to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed 12/04/2023 in Ventura, California.

A handwritten signature in black ink, appearing to read "Taylor Greig", is written over a horizontal line.

Taylor Greig
Special Agent
Federal Bureau of Investigation